

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. CORINTHIAN JOHNN REESE,

2. GLENN EVERETT GRADDY, and

3. NICOLE RENEE MCDANIEL,

Defendants.

INDICTMENT

CR 11-254 ADM/SER

) (18 U.S.C. § 2)
) (18 U.S.C. § 922(g)(1))
) (18 U.S.C. § 924(a)(2))
) (18 U.S.C. § 924(c))
) (18 U.S.C. § 924(d)(1))
) (18 U.S.C. § 924(o))
) (18 U.S.C. § 1951(a))
) (28 U.S.C. § 2461(c))

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Interfere with Commerce by Robbery - "Hobbs Act")

On or about May 21, 2011, in the State and District of Minnesota, the defendants,

**CORINTHIAN JOHNN REESE,
GLENN EVERETT GRADDY, and
NICOLE RENEE MCDANIEL,**

knowingly and intentionally conspired with each other and with other persons, whose names are known and unknown to the grand jury, to unlawfully obstruct, delay and affect commerce (as that term is defined in Title 18, United States Code, Section 1951) and the movement of articles and commodities in such commerce, by robbery (as that term is defined in Title 18, United States Code, Section 1951), in that the defendants conspired to unlawfully take and obtain property consisting of U.S. Currency from the person and presence of employees of the Pot O'Gold Bingo Hall, against the

SCANNED
AUG 17 2011
U.S. DISTRICT COURT MPLS

FILED AUG 17 2011
RICHARD J. SLEETER, CLERK
JUDGMENT ENTERED
DEPUTY CLERK

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employees' will, by means of actual and threatened force, violence, and by means of violence and fear of injury to their persons and property, including through the use of a firearm to compel the employees to relinquish U.S. Currency belonging to the Pot O'Gold Bingo Hall, a business engaged in interstate commerce, all in violation of Title 18, United States Code, Section 1951(a).

COUNT 2

(Aiding and Abetting the Interference with Commerce
by Robbery - "Hobbs Act")

On or about May 21, 2011, in the State and District of Minnesota, the defendants,

**CORINTHIAN JOHNN REESE,
GLENN EVERETT GRADDY, and
NICOLE RENEE MCDANIEL,**

aiding and abetting each other and other persons, whose names are known and unknown to the grand jury, did unlawfully obstruct, delay and affect commerce (as that term is defined in Title 18, United States Code, Section 1951) and the movement of articles and commodities in such commerce, by robbery (as that term is defined in Title 18, United States Code, Section 1951), in that the defendants did unlawfully take and obtain property consisting of U.S. Currency from the person and presence of employees of the Pot O'Gold Bingo Hall, against the employees' will, by means of actual and threatened force, violence, and by means of violence and fear of injury to their persons and property, including through the use

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of a firearm to compel the employees to relinquish U.S. Currency belonging to the Pot O'Gold Bingo Hall, a business engaged in interstate commerce, all in violation of Title 18, United States Code, Sections 2 and 1951(a).

COUNT 3

(Conspiracy to Possess a Firearm in Furtherance of
a Crime of Violence)

On or about May 21, 2011, in the State and District of Minnesota, the defendants,

**CORINTHIAN JOHNN REESE,
GLENN EVERETT GRADDY, and
NICOLE RENEE MCDANIEL,**

during and in relation to a crime of violence for which they may be prosecuted in a court of the United States (that is, the armed robbery described in Counts 1 and 2 of this Indictment), knowingly and intentionally conspired with each other and with other persons, whose names are known and unknown to the grand jury, to use and carry a firearm, specifically, a U.S. Army Brand M1911A1 .45 Caliber handgun, serial number 1851436, all in violation of Title 18, United States Code, Section 924(o).

COUNT 4

(Possession of a Firearm in Furtherance of
a Crime of Violence)

On or about May 21, 2011, in the State and District of Minnesota, the defendants,

**CORINTHIAN JOHNN REESE,
GLENN EVERETT GRADDY, and**

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NICOLE RENEE MCDANIEL,

aiding and abetting each other, and others known and unknown to the grand jury, did knowingly use and carry a firearm, specifically, a U.S. Army Brand M1911A1 .45 Caliber handgun, serial number 1851436, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States (that is, the armed robbery described in Counts 1 and 2 of this Indictment), all in violation of Title 18, United States Code, Sections 2 and 924(c).

COUNT 5

(Felon in Possession of a Firearm)

On or about May 21, 2011, in the State and District of Minnesota, the defendant,

CORINTHIAN JOHNN REESE,

a person who has previously been convicted of a crime punishable by imprisonment for a term exceeding one year, including:

Crime	Court	Year of Conviction
Assault-Third Degree-Substantial Bodily Harm	Ramsey County, MN District Court	2009
Assault-Third Degree-Substantial Bodily Harm	Ramsey County, MN District Court	2008

did knowingly possess in and affecting interstate and foreign commerce one U.S. Army Brand M1911A1 .45 Caliber handgun, serial number 1851436, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

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FORFEITURE ALLEGATIONS

Counts 1 through 5 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense alleged in Count 1 of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Sections 2 and 1951(a).

Upon conviction of the offenses alleged in Counts 2 through 4 of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), any firearm with accessories and any ammunition involved or used in any knowing violations of Title 18, United States Code, sections 922(g)(1), 924(a)(2), 924(c), and 924(o), including one U.S. Army Brand M1911A1 .45 Caliber handgun, serial number 1851436.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Sections 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

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All in violation of Title 18, United States Code, Sections 922(g), 924(a)(2), 924(c), 924(d)(1), and 1951(a), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON